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Mr. Roger K. Patterson
Regional Director
U.S. Bureau of Reclamation
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825-1898

Dear Roger,

Thank you for requesting comments on the second revision of the Draft Environmental Assessment (EA) for the Red Bluff Pilot Pumping Plant (RBPPP). In a letter dated June 24, 1993, you also requested reinitiation of consultation concerning the RBPPP project in order to accommodate project modifications that are assessed in this draft EA.

A meeting was held between our respective staffs on June 30, 1993, to discuss the RBPPP project modifications and the consultation process. Several issues arose during the meeting that need to be resolved as soon as possible so that the reinitiated consultation may be completed in the timeframe you requested. The following comments on the draft EA address these issues:

(1) Bureau requests for more flexibility in operating RBDD should be based on evidence showing historic water demand and delivery rates.

The EA does not provide any analysis of historic water demand and deliveries to Tehama-Colusa (T-C) canal water users. This information, broken down into monthly delivery rates, is critical for the ongoing Section 7 consultation, and for future interagency consultation during real-time management of the Red Bluff facilities.

The pilot pumping plant will provide up to 300 cfs water delivery once it is constructed. The existing "temporary" pump facilities provide 125 cfs. The Stony Creek CHO (constant-head orifice) facility can provide up to 300 cfs to the Tehama-Colusa canal. Thus, these facilities may provide up to a total of 725 cfs.

During the meeting on June 30, Mr. Rich Kristoff of your staff requested more flexibility in the operations of the Red



Bluff Diversion Dam (RBDD) gates to meet water delivery needs. Apparently, there is concern that the September 15 through May 15 gates-up operation required by the Long-term Operations CVP-OCAP opinion may prevent adequate water deliveries and require the Bureau to request temporary gate closures.

However, while strongly weather dependent, T-C deliveries averaged 130 cfs in March and 301 cfs in April over the last eight years (Mr. Kristoff, pers. comm.). Even without the pilot pumping plant, it appears that normal delivery needs could be met without gate closures by using the 425 cfs total capacity available from the Stony Creek CHO and "temporary" pump facilities. Unless evidence is provided to demonstrate the Bureau's inability to meet water delivery needs, I will assume that the Bureau will be able to meet water delivery needs while complying with a September 15 through May 15 gates-up operation.

(2) The need for RBDD gate closures during sheetpile cofferdam construction and removal should be clarified.

According to the EA, the gates would need to be closed during RBPPP construction, which will occur from about April 1 through December 1, 1994. However, the EA also states that "the impediment will be limited to the period when sheetpiling is being installed or removed." First, the EA does not describe why the gates need to be lowered to allow cofferdam construction and cofferdam removal. Cofferdams are routinely constructed and removed without upstream flow control. Second, the EA does not adequately define the time periods of cofferdam construction and removal. If the Bureau can demonstrate the need to lower the gates during cofferdam construction, it would be ideal to limit this period to the minimum time necessary to complete construction by April 30, 1994. If cofferdam construction can be completed in two weeks, then the gates should not be lowered until April 15, 1994. This would maximize the time period of unimpeded passage for winter-run chinook salmon to their spawning grounds upstream of Red Bluff.

(3) The monitoring and evaluation studies should be included in the EA.

The RBPPP is an experimental facility. As stated on p. 21 of the EA, one of the primary purposes of the project is to "design a test facility that minimizes salmonid mortality while allowing a thorough assessment of the appropriateness of this type of facility as a long-term solution." Therefore, without monitoring and evaluation studies to determine the effectiveness of this facility to both deliver water and reduce fish mortality, the stated project purpose will not be achieved. Further, the Bureau recognizes that there may be some unforeseen sources of salmon mortality, and has made the commitment to correct to the extent practicable any design or operational sources of mortality found during the evaluation studies (p. 22 of the EA). Finally, development and implementation of a comprehensive biological

monitoring and evaluation plan is one of the terms and conditions of the RBPPP biological opinion.

Mr. Charles Liston of the Bureau's Denver office has developed a preliminary document on the proposed scope of biological research and evaluations for the RBPPP (dated September 27, 1992). Given the importance of biological monitoring and evaluation, I am concerned that there has been little or no apparent progress in finalizing and funding this mandatory component of the overall project. I had expected that a monitoring and evaluation plan would have been adequately defined in time to include it in the draft EA. The Bureau should commit to implementing the biological monitoring and evaluation plan in Appendix A of the EA (Environmental Commitments).

(4) The proposed alternative methods for improving sweeping flows at the facility should be phased.

The most significant change in the current draft EA is the addition of measures to address sweeping flows at the intake to the RBPPP. These measures include dam gate manipulations, dredging, and construction approaches such as the installation of groins or channel restrictors. In order to minimize the potential impacts of these measures, the Bureau should start with gate manipulations and dredging, monitor sweeping flows, and move on to groin and channel restrictors only as necessary to achieve adequate sweeping flows. The Bureau should include monitoring and evaluation of these sweeping flow improvement measures and associated biological impacts as part of the overall biological monitoring and evaluation plan.

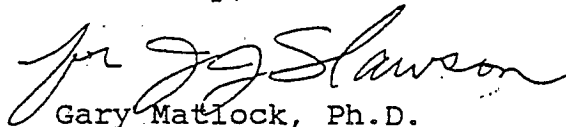
Based on the available information, I think that gate manipulation to achieve sweeping flows should not create more than a 1.2' head differential across the dam, and that dredging should be restricted to the period of January 1 through April 15 of each year in order to avoid the fall-run and winter-run chinook salmon spawning periods. If these two objectives cannot be met, then your staff should present evidence for this during the ongoing Section 7 consultation.

(5) The EA should describe the need to shut down two bypasses in the T-C screen facility in order to tie in bypasses from the RBPPP.

The fish bypasses from the RBPPP will be tied into two of the four existing T-C screen facility fish bypasses. This will require two of the T-C fish bypasses to be shut down for a two week period in June 1994 (Mr. Kristoff, pers. comm., October 1, 1992). During the shutdown of these bypasses, outmigrating juvenile salmon may be delayed in their passage back to the river through the T-C screening facilities. Therefore, the EA should describe this potential impact on juvenile salmonids and make a commitment to limit bypass shutdown to a two-week period.

If you have any questions regarding these comments please
contact Mr. Christopher Mobley at (707) 578-7513.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Matlock".

Gary Matlock, Ph.D.
Acting Regional Director